

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA**

LISSETTE LARIOS ROOHBAKHSH, as
personal representative of the ESTATE
OF FATIMA LISSETTE LARIOS and on
behalf of next of kin,

Case No. 8:17-cv-00031

and

NELSON LARIOS, as next of kin,

**DECLARATION OF SHELLEY
DUNBAR**

Plaintiffs,

v.

BOARD OF TRUSTEES OF THE
NEBRASKA STATE COLLEGES,

and

CHADRON STATE COLLEGE,

Defendants.

I, Shelley Dunbar, hereby depose and state as follows:

1. I am over 21 years old and have personal knowledge of the matters set forth in this declaration.

2. I am a former employee of Chadron State College ("CSC"). During my time at CSC, I held the positions of Human Resource Director, Human Resource Coordinator, and Title IX Coordinator. I served as the Human Resource Director and Title IX Coordinator from August 2014-January 2015 and as the Human Resource Coordinator from January 2015-August 2015.

3. No CSC official witnessed, nor had knowledge of, Fatima Larios' physical attack on A [REDACTED] R [REDACTED] at the October 31, 2014 CSC Halloween Dance.

4. Fatima Larios did not respond to my November 11, 2014 email inquiring as to any concerns or issues that she may have relating to Board Policy 3020.

5. Prior to Fatima Larios' death, no CSC official had knowledge that several students had witnessed incidents in which Fatima Larios hit, scratched, or was otherwise physically violent towards Brandon Gardner and A [REDACTED] R [REDACTED].

6. Prior to Fatima Larios' death, no CSC official viewed or had knowledge of any text messages between Fatima Larios and Brandon Gardner evidencing alleged verbal abuse.

7. Exhibit 31 is a true and correct copy of my November 5, 2014 email to Robert Stack and Joel Smith regarding F. Larios Title IX Concern.

[Remainder of page intentionally left blank]

I declare under penalty of perjury that the foregoing is true and correct. Executed on
this 6 day of February 2019.


Shelley Dunbar